



*Attorneys At Law*

EDWARD P. FLOOD  
E-Mail: eflood@lyons-flood.com

ADMITTED IN NEW YORK

LYONS & FLOOD PLLC  
THE TOWERS, SUITE 206  
111 GREAT NECK ROAD  
GREAT NECK, NY 11021  
TEL (212) 594-2400  
FAX (212) 594-4589  
www.lyons-flood.com

November 14, 2024

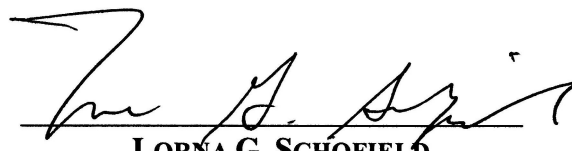
**VIA ECF**

Honorable Lorna G. Schofield  
United States District Judge  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

Application **GRANTED** in part and **DENIED** in part. The initial conference scheduled for November 20, 2024, is adjourned to **December 18, 2024, at 4:20pm**. The materials described at Dkt. 7 shall be filed by **December 11, 2024**.

Dated: November 15, 2024  
New York, New York

Re: *ACE American Insurance Co. et ano v.*  
*Blue Eagle Consolidation Services GmbN et*  
*ano v. MSC Mediterranean Shipping Co. S.A.*  
24 CIV. 07503 (LGS)

  
**LORNA G. SCHOFIELD**

**UNITED STATES DISTRICT JUDGE**

Dear Judge Schofield:

Just two days ago we were retained by Third-Party Defendant MSC Mediterranean Shipping Co. S.A. ("MSC") to represent their interests in the above-captioned matter. We write to respectfully request an adjournment of the Court Conference presently scheduled for November 20, 2024 for the reasons set forth below.

Although Plaintiffs' counsel transmitted to MSC a copy of the Court's Order dated October 17, 2024 [ECF No. 7] by e-mail dated October 30, 2024 and a copy of the Third-Party Complaint by e-mail dated November 1, 2024, MSC only received the Summons and Third-Party Complaint and Waiver of Service on November 11, 2024 and only signed the Waiver of Service on November 12, 2024 and MSC appointed us later that day. Yesterday we were informed about the November 20, 2024 conference and saw for the first time the proposed Case Management Plan prepared by other parties.

The undersigned and my partner have filed Notices of Appearance in the case but we have not yet had an opportunity to review the documentation relating to this case, let alone prepare and file MSC's Answer to the Third-Party Complaint, which answer is not due until January 6, 2025. We therefore believe the November 20, 2024 conference is premature and respectfully request that it be adjourned for one (1) month. This adjournment will provide us an opportunity to review the materials related to this action, confer with our client and confer with opposing counsel as to the content of the Case Management Plan.

We have spoken with counsel for the other parties and they have no objection to this application.

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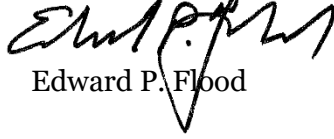
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We thank the Court for Your Honor's attention to this matter.

Respectfully submitted,

**Lyons & Flood, PLLC**

A handwritten signature in black ink, appearing to read "Edward P. Flood", written over the printed name.

Edward P. Flood